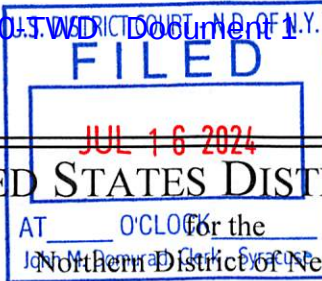


AO 91 (Rev. 11/11) Criminal Complaint



UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA

v.

WILLIAM SENECA, SR.

Defendant.

Case No.

5:24-mj-320 (TWD)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. From in or about 2000 – 2008 in the county of Onondaga in the Northern District of New York the defendant violated:

Code Section

18 U.S.C. § 2251(a)

Offense Description

Sexual Exploitation of a Child

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.LINDSEY R
VALENTINODigitally signed by LINDSEY R
VALENTINODate: 2024.07.16 15:05:36
-04'00'*Complainant's signature*

Lindsey R. Valentino, Special Agent

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: July 16, 2024

Judge's signature

City and State: Syracuse, New York

Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Lindsey Valentino, being first duly sworn, do hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a criminal complaint and arrest warrant for William Seneca, Sr. charging Seneca with sexual exploitation of a child, in violation of Title 18, United States Code, Section 2251(a).

2. Your affiant is a Special Agent employed by Homeland Security Investigations (HSI) since September 2019. Your affiant successfully completed the Criminal Investigatory Training Program and the Homeland Security Investigations Special Agent Training at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. While at training, your affiant received training in child exploitation investigations. Your affiant received specialized undercover chat training by the Internet Crimes Against Children (ICAC) Task Force in March of 2023. Prior to working as a Special Agent, your affiant was a United States Border Patrol Intelligence Agent (BPAI) and a Task Force Officer (TFO) with HSI's Border Enforcement Security Task Force (BEST) in Massena, New York. Your affiant has investigated and assisted in the prosecution of child exploitation related crimes, and your affiant has executed several search warrants for various state and federal felony crimes. Prior to working as an intelligence agent and a TFO, your affiant was a United States Border Patrol Agent in Massena, New York and San Diego, California. Your affiant received their Bachelor of Science Degree in Criminal Justice from Medaille College in Buffalo, New York. Your affiant has investigated criminal violations of the Subject Offenses on several prior occasions.

3. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including

other law enforcement officers, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described here, and information gained through my training and experience. I have not set forth everything I know about this investigation. I have instead included facts to establish probable cause to believe that Seneca committed the charged offense.

PROBABLE CAUSE

4. Pursuant to HSI's Victim Identification Task Force Operation Renewed Hope, the Victim Identification Program at the HSI Cyber Crimes Center is hosting a Task Force investigating unidentified victims depicted in child pornography files known to be circulating on the internet. HSI Special Agents reviewed the series known as "Red Squared Duvet," a series known in Interpol's International Child Sexual Exploitation database as a Child Sexual Abuse Material (CSAM) Series. The images within the series depict a pubescent male laying on a red blanket on a bed with his genitals exposed in a lewd and lascivious fashion. Prior to this investigation, the child depicted in "Red Squared Duvet" (*i.e.*, V1), had not been identified.

5. Using law enforcement technology, law enforcement databases, and open-source databases, HSI Special Agents identified a now adult man as a possible match for the child depicted in the "Red Squared Duvet" series and learned that that person lived in or around the Syracuse, New York area.

6. In March of 2024, HSI Syracuse Special Agents, along with an HSI Forensic Interview Specialist, conducted a forensic interview of V1. During the interview, V1 identified himself in the images associated with the "Red Squared Duvet" series and said he was approximately 10 to 12 years of age when the images were taken. V1 stated that Seneca took the pictures at his house. V1 stated further that Seneca had sexually abused him for approximately 8

years, starting when V1 was approximately 7 or 8 years of age and continuing until V1 was approximately 15 years of age. V1 stated the sexual abuse began in 2000 or 2001.

7. In April of 2024, V1 contacted HSI Special Agents regarding a message he received from Seneca through a social media platform. HSI Special Agents received V1's consent to assume V1's online identity on the social media platform to further the investigation. HSI Special Agent known as UCA-SA-9523 thereafter assumed V1's online identity on the social media account starting on April 2, 2024. UCA-SA-9523, thereafter posing as V1, sent a message to Seneca on that day and again on April 3, 2024. Seneca replied on April 3, 2024.

8. During the conversation, Seneca made statements that reflected his belief that he was still communicating with V1. For example, Seneca referred to V1 by V1's true name on multiple occasions and during discussions where Seneca referred to events known only to Seneca and V1, including references to Seneca's sexual exploitation of V1 when V1 was a child.

9. In May of 2024, law enforcement contacted the National Center for Missing and Exploited Children ("NCMEC") to verify if there were any additional photos of V1.¹ NCMEC returned 20 images, including the original "Red Squared Duvet" series images. Some of the images had been recovered in child pornography investigations around the country and had thereafter been reported to NCMEC, which maintains a repository of known child pornography series with identified and unidentified victims.

10. For example, NCMEC identified CyberTip 10221597 as including several child pornography files depicting V1. The naming conventions for the files are consistent with V1's true name and age when the images were produced.

¹ NCMEC is a private, non-profit corporation with a mission of helping find missing children, reduce child sexual exploitation, and prevent victimization.

11. A photo ending in “0702.jpg” also known as, “[V1’s first name]_13y_lil_bro_4.jpg” depicts a pubescent male approximately 12 to 13 years old.² The minor male (now identified as V1) is bent over on his hands and knees on a bed, his naked buttocks is exposed to the camera, and the focal point of the image is his anus. V1 is looking over his shoulder back toward the camera. The bed in the image appears to have the same frame as the bed in the original photos from the “Red Squared Duvet” series. On May 29, 2024, V1 identified himself in the photo and stated Seneca took the picture.

12. UCA-SA-9523 continued the chat with Seneca on April 3, 2024, including discussing sexually explicit images believed to have been created by Seneca depicting V1, including the following statement: “And I had one of you on all fours booty in the air”

13. On April 4, 2024, UCA-SA-9523 transitioned the chat conversation to a Google Voice platform utilizing the phone number: 315-XXX-XXXX to communicate with Seneca.

14. Throughout the course of the conversation, Seneca repeatedly referenced his sexual attraction to V1 when V1 was a child. Seneca admitted engaging in several sexual encounters with V1 and sent several non-pornographic images of V1 from the time of the abuse.

15. On May 29, 2024, HSI Special Agents along with an HSI Forensic Interview Specialist conducted a second forensic interview with V1. V1 was shown the additional images received from NCMEC and described above. V1 identified himself in 19 of the 20 images. He was unsure about whether he was the minor depicted in one of the images because it was too close-up to see identifying characteristics. V1 said Seneca took all 19 of the images using Seneca’s silver

² The actual file name includes V1’s true first name, which is omitted here but can be shown to the Court upon request.

digital camera, including the following, some of which, in my training and experience, are child pornography within the meaning of federal law:

a. NCMEC Image ending in “9681.jpg”, that, according to V1, depicts Seneca standing naked next to V1 then aged approximately 11-13 years old who also was naked and has an erection. Seneca’s genitals are touching or near V1’s arm/shoulder area.

b. NCMEC Image ending with “eb84c.jpg” (not child pornography) that, according to V1, depicts V1 as a child aged 11-13 years old sitting at a desk wearing a tan t-shirt with a green hat. A photograph of Seneca’s daughter is visible in the background.

c. NCMEC Image ending with “1d06c.jpg” that, according to V1, depicts him naked with an erection sitting in a chair at a computer desk. In the background of the photo is a lockbox that V1 identified as a fireproof safe owned by Seneca.

16. On July 16, 2024, investigators executed a search warrant at Seneca’s residence. Among other things, investigators located at least one item inside Seneca’s home that appears to match an item depicted in the background of one or more of the child pornography files described above.

17. On the same day, investigators also conducted a recorded interview of Seneca. After he received *Miranda* warnings, Seneca, among other things, admitted in sum and substance to: (a) sexual contact with V1, including oral sex, when V1 was a minor; (b) creating the above-described child pornography files depicting V1 with a digital camera; and (c) distributing the child pornography files that he created depicting V1 to a person he believed to reside in Canada, at or about the time Seneca had created such images.

CONCLUSION

18. Based upon the above information, I respectfully request that the Court issue the proposed criminal complaint and sign the associated arrest warrant.

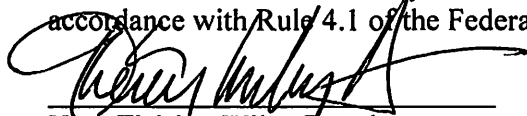
ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE.

LINDSEY R
VALENTINO

Digitally signed by LINDSEY R
VALENTINO
Date: 2024.07.16 15:06:23 -04'00'

Lindsey R. Valentino
Special Agent
Homeland Security Investigations

I, the Honorable Thérèse Wiley Dancks, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on the 16th day of July of 2024 in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



Hon. Thérèse Wiley Dancks
United States Magistrate Judge